

EXHIBIT 14

I, JESSICA MURPHY, do hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge, information and belief:

1. I am an Education Advocate at Disability Rights Michigan.
2. I reviewed state complaint decisions from 2017 to 2023 where Michigan Department of Education (MDE) determined that either Kalamazoo or Kalamazoo RESA were out of compliance with child find and evaluation obligations under state and federal law.
3. I obtained some of those state complaint decisions through parents and advocates, and the others directly from MDE through FOIA requests, discovery requests, or its routine complaint procedure.
4. From those state complaint decisions, I compiled a spreadsheet to summarize information pulled directly from the complaint decisions. The information on the spreadsheet is the date of filing, date of decision, and a summary of what was required by the corrective action plans—whether student specific or district wide, the date corrective actions were due, and the date one year from the date of the decision.
5. I also reviewed over 750 state complaint decisions issued between 2018 and 2023 involving districts and intermediate school districts across Michigan. A third party unrelated to the present litigation received the state complaint decisions through FOIA requests. The third party then provided the state complaint decisions to counsel for this case.
6. Based on those decisions, I identified complaints where MDE found districts repeatedly out of compliance for child find and evaluation obligations under state and federal law.
7. For each district identified, I compiled a new spreadsheet to summarize information pulled directly from the complaint decisions. The information on the spreadsheet is the date of filing, date of decision, and a summary of what was required by the corrective action plans—whether student specific or district wide, the date corrective actions were due, and the date one year from the date of the decision.

8. Attached to this declaration at Exhibits 7, 8, 9, and 10 are true and accurate copies of the spreadsheets I created summarizing the information I've described herein.

I declare under penalty of perjury that the foregoing is true and correct.

Dated

4/3/2025

Jessica Murphy

